

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE  
OPINIONS OF DEFENSE EXPERT TIMOTHY ANDERSON**

**TO:** Jessica Davidson, Esq,  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
One Manhattan West  
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*Liaison Counsel for Defendants*

**PLEASE TAKE NOTICE** that pursuant to Case Management Order No. 29 revised by Text Order dated 2/24/2023 (Document Number 2271), Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Timothy Anderson.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of David J. Stanoch in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

Respectfully Submitted,

ON BEHALF OF PLAINTIFFS

By: /s/ David J. Stanoch  
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Dated: March 13, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2023, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing document will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com).

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